

The National Coffee Association is extremely concerned about recently published Federal Communications Commission regulations governing unsolicited fax advertisements.

FCC is urged to amend the regulations, thereby returning the "established business relationship" qualification to the regulation. As proposed, the removal of this language will cause significant burden to the Association and needlessly require the National Coffee Association to obtain written consent from its members prior to transmitting faxes to Association members that could be deemed to be commercial in nature.

The National Coffee Association is further concerned about the ambiguous nature of the regulations. Specifically, clarity is absent regarding exactly which transmissions the FCC would interpret as commercial in nature, whether written consent to a national association would extend to chapter or affiliate faxes, and whether a written consent form would expire with membership.

Thank you for the opportunity to comment of the above referenced regulation.

Sincerely,

Robert F. Nelson
President & Chief Executive Officer